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**To:** "wvogl@samhsa.gov" <wvogl@samhsa.gov>  
**Date:** 7/9/04 5:56PM  
**Subject:** Substance Abuse & Mental Health Services Administration, HHS, 62 FR 51118  
Comment to proposed revisions

Please consider the following comments:

1. Subpart D Section 4.1c states that an employee working for a testing facility must not act as a collector if the employee could link the identity of the donor to the donor's drug test result.

In theory this procedure sounds acceptable, but in rural areas and when the collector is assigned to a territory, the donors become familiar with the employee/collector. Confidentiality forms should be signed by the employee/collector at the start of accepting such position.

2. Subpart D Section 4.3 b, 2 states that in order for the collector's training to be acceptable under these guidelines the collector must complete a "train the trainer" course given by an established organization.

An "established organization" needs to be defined. Also, a model course (course curriculum) based on the product used for drug testing should be approved by DHHS. Periodic re-certification is necessary in order to guarantee the trainers have retained the information provided through the course. Training requirements (new, recert, and error correction) should mirror the DOT standards, especially when an error could cause an innocent person to lose their job because of a lack of training.

Should you have any questions, I can be reached via telephone, fax, or email.

Best Regards,

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